

SUPPLEMENTAL RESPONSE TO  
OFFICE ACTION DATED OCTOBER 3, 2006

Appln. No. 09/744,351

- 2 -

May 24, 2007

**REMARKS**

This is in response to the Office communication dated May 7, 2007 with respect to the Office Action dated October 3, 2006. Reconsideration is respectfully requested.

Status of Application

Claims 1, 2 and 19-36 are pending, and all are rejected. Applicants addressed various of the rejections in a previous reply filed January 24, 2007. Applicants acknowledge that arguments traversing the rejections of Claims 22 and 29 were inadvertently omitted from the previous reply and thank the Examiner for permitting the rejections of these claims to be addressed in this reply.

Summary of the Rejections

Claims 22 and 29 are rejected as obvious over U.S. Patent No. 4,436,119 to Shahan et al in view of U.S. Patent No. 3,523,395 to Rutter et al.

Arguments Traversing Rejections of Claims 22 and 29

Applicants respectfully traverse the rejection of Claims 22 and 29, contending that the cited references, Shahan et al and Rutter et al, fail to meet the requirements necessary to establish a *prima facie* case of obviousness. The applicants' position is explained below in the arguments traversing the rejections.

Claims 22 and 29

Claims 22 and 29 depend, either directly or indirectly, upon independent Claim 1, and therefore, all of the recitations of Claim 1 are present in these claims as well. Claim 1, as amended, recites an insulation module for a process vessel, the module having an outer surface layer and a thermal insulation layer opposing a portion of the outer wall of the process vessel. Brackets are secured to the outer

SUPPLEMENTAL RESPONSE TO  
OFFICE ACTION DATED OCTOBER 3, 2006

Appln. No. 09/744,351

- 3 -

May 24, 2007

surface layer of the insulation module. The brackets extend toward the outer wall of the process vessel and are secured directly to the outer wall. An example of such a bracket is illustrated in Figures 1 and 2 of the application, wherein the bracket 7 is attached to outer surface layer 3 and extends through insulation layer 5 to the outer wall of process vessel 2, where a mounting leg 8 is attached directly to the outer wall by a cleat 16.

Claim 22 recites that a speed clip member is secured to a free end of a fixing screw (recited in Claim 21, an intervening claim upon which Claim 22 depends), the fixing screw being part of the mounting means recited in Claim 1.

Shahan et al is cited as disclosing all of the structure recited in Claim 1, and Rutter et al is cited only for its teaching of the use of a "fast connector", the Examiner contending that it would be obvious modify Shahan et al by the teachings of Rutter et al and provide a fast connector, thereby rendering Claim 22 obvious. However, one of the criteria necessary to establish a *prima facie* case of obviousness requires that the prior art references, when combined, must teach or suggest all claim recitations.

Shahan et al does not disclose the structure recited in amended Claim 1. There is, in fact, no direct connection in Shahan et al between the outer surface layer 12 and the outer wall of pipe 11 as shown in Figure 2 of the reference. Outer wall 12 is attached to an inner lining 14 by the insulation layer 13 or a vibration isolator 22, shown in detail in Figure 4. In turn, an isolation spacer 15 (see Figure 2) is positioned between the inner lining 14 and the outer wall of pipe 11, the isolation space 15 being on the opposite side of inner lining 14 from the vibration isolator 22. There is however, no bracket that attaches outer surface layer 12

SUPPLEMENTAL RESPONSE TO  
OFFICE ACTION DATED OCTOBER 3, 2006

Appln. No. 09/744,351

- 4 -

May 24, 2007

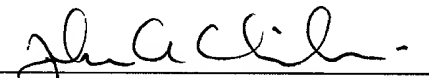
directly to the outer wall of pipe 11 as recited in Claim 1. Lacking this element, the combination of Shahan et al as modified by Rutter et al cannot properly support a rejection of Claim 1 on the basis of obviousness because all claim recitations are not taught or suggested by the proposed combination of references.

Similarly, Claim 29 depends upon Claim 1 and recites various materials which may comprise the insulation layer recited in Claim 1. The Examiner cites Rutter et al as teaching the insulation materials recited in Claim 29. Again, however, applicants note that the combination of Shahan et al and Rutter et al fails to teach or suggest all claim limitations because both Shahan et al and Rutter et al fail to teach the structure recited in Claim 1 in which there is a direct connection between the outer surface layer of the insulation module and the outer wall of the process vessel. All claim recitations for Claim 29 are not taught or suggested in the combination of Shahan et al and Rutter et al, and these references cannot form the basis in support of an obviousness rejection.

An early and favorable examination is earnestly solicited.

Respectfully submitted,

SYNNESTVEDT & LECHNER LLP

By:   
John A. Chionchio  
Reg. No. 40,954

1101 Market Street, Suite 2600  
Philadelphia, PA 19107-2950  
Telephone: (215) 923-4466  
Facsimile: (215) 923-2189

JAC/dml